

Exhibit A

[Proposed Order]

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
RTI HOLDING COMPANY, LLC, <i>et al.</i> , ¹	Case No. 20-12456 (JTD)
Reorganized Debtors.	(Jointly Administered)
PROTECTIVE LIFE INSURANCE COMPANY,	
Interpleader Plaintiff,	
v.	Adv. Proc. No. 21-50311 (JTD)
RUBY TUESDAY, INC., RUBY TUESDAY OPERATIONS LLC, ELEANOR TAYLOR, DAVID G. LYNCH, JOHN J. LYNCH III, JOSEPH P. LYNCH, CATHERINE BUCK, and FRANCIS S. LYNCH,	
Interpleader Defendants.	

**ORDER APPROVING STIPULATION EXTENDING TIME FOR CERTAIN
INTERPLEADER DEFENDANTS TO ANSWER, MOVE
OR OTHERWISE RESPOND TO COMPLAINT**

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: RTI Holding Company, LLC (4966); Ruby Tuesday, Inc. (5239); Ruby Tuesday, LLC (1391); RTBD, LLC (6505); RT of Carroll County, LLC (8836); RT Denver Franchise, L.P. (2621); RT Detroit Franchise, LLC (8738); RT Distributing, LLC (6096); RT Finance, LLC (7242); RT FL Gift Cards, Inc. (2189); RT Florida Equity, LLC (7159); RT Franchise Acquisition, LLC (1438); RT of Fruitland, Inc. (1103); RT Indianapolis Franchise, LLC (6016); RT Jonesboro Club (2726); RT KCMO Franchise, LLC (7020); RT Kentucky Restaurant Holdings, LLC (7435); RT Las Vegas Franchise, LLC (4969); RT Long Island Franchise, LLC (4072); RT of Maryland, LLC (7395); RT Michiana Franchise, LLC (8739); RT Michigan Franchise, LLC (8760); RT Minneapolis Franchise, LLC (2746); RT Minneapolis Holdings, LLC (7189); RT New England Franchise, LLC (4970); RT New Hampshire Restaurant Holdings, LLC (7438); RT New York Franchise, LLC (1154); RT Omaha Franchise, LLC (7442); RT Omaha Holdings, LLC (8647); RT One Percent Holdings, LLC (6689); RT One Percent Holdings II, LLC (2817); RT Orlando Franchise, LP (5105); RT Restaurant Services, LLC (7283); RT South Florida Franchise, LP (3535); RT Southwest Franchise, LLC (9715); RT St. Louis Franchise, LLC (6010); RT Tampa Franchise, LP (5290); RT Western Missouri Franchise, LLC (6082); RT West Palm Beach Franchise, LP (0359); RTTA, LP (0035); RTT Texas, Inc. (2461); RTTT, LLC (9194); Ruby Tuesday of Allegany County, Inc. (8011); Ruby Tuesday of Bryant, Inc. (6703); Ruby Tuesday of Columbia, Inc. (4091); Ruby Tuesday of Frederick, Inc. (4249); Ruby Tuesday of Linthicum, Inc. (8716); Ruby Tuesday of Marley Station, Inc. (1641); Ruby Tuesday of Pocomoke City, Inc. (0472); Ruby Tuesday of Russellville, Inc. (1601); and Ruby Tuesday of Salisbury, Inc. (5432). The Debtors' mailing address is 333 East Broadway Ave., Maryville, TN 37804.

This Court having considered the *Stipulation for Extension of Time for Certain Interpleader Defendants to Answer, Move or Otherwise Respond to Complaint* (the “Stipulation”) between Protective Life Insurance Company (the “Plaintiff”) and Ruby Tuesday Operations LLC (“RTO”), successor in interest to Ruby Tuesday, Inc. (“RTI”) pursuant to the confirmed and effective *Debtors’ Second Amended Chapter 11 Plan, as Modified*, Docket No. 1135 (the “Plan”), Eleanor Taylor, David G. Lynch, John J. Lynch III, Joseph P. Lynch, Catherine Buck and Francis S. Lynch (collectively the “Lynch Defendants” and together with RTO, “Certain Interpleader Defendants”) attached hereto as **Exhibit 1**; the Court having determined that good and adequate cause exists for approval of the Stipulation; and the Court having determines that no further notice of the Stipulation must be given; it is hereby

ORDERED that the Stipulation is approved, and it is;

FURTHER ORDERED that the time within the Certain Interpleader Defendants may answer, move or otherwise plead to the Complaint is hereby extended to and including June 28, 2021.

Exhibit 1

[Stipulation]

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
RTI HOLDING COMPANY, LLC, <i>et al.</i> , ¹	Case No. 20-12456 (JTD)
Reorganized Debtors.	(Jointly Administered)
PROTECTIVE LIFE INSURANCE COMPANY,	
Interpleader Plaintiff,	
v.	Adv. Proc. No. 21-50311 (JTD)
RUBY TUESDAY, INC., RUBY TUESDAY OPERATIONS LLC, ELEANOR TAYLOR, DAVID G. LYNCH, JOHN J. LYNCH III, JOSEPH P. LYNCH, CATHERINE BUCK, and FRANCIS S. LYNCH,	
Interpleader Defendants.	

**STIPULATION FOR EXTENSION OF TIME FOR CERTAIN INTERPLEADER
DEFENDANTS TO ANSWER, MOVE OR OTHERWISE RESPOND TO COMPLAINT**

¹ The Debtors in these chapter 11 cases and the last four digits of each Debtor's U.S. tax identification number are as follows: RTI Holding Company, LLC (4966); Ruby Tuesday, Inc. (5239); Ruby Tuesday, LLC (1391); RTBD, LLC (6505); RT of Carroll County, LLC (8836); RT Denver Franchise, L.P. (2621); RT Detroit Franchise, LLC (8738); RT Distributing, LLC (6096); RT Finance, LLC (7242); RT FL Gift Cards, Inc. (2189); RT Florida Equity, LLC (7159); RT Franchise Acquisition, LLC (1438); RT of Fruitland, Inc. (1103); RT Indianapolis Franchise, LLC (6016); RT Jonesboro Club (2726); RT KCMO Franchise, LLC (7020); RT Kentucky Restaurant Holdings, LLC (7435); RT Las Vegas Franchise, LLC (4969); RT Long Island Franchise, LLC (4072); RT of Maryland, LLC (7395); RT Michiana Franchise, LLC (8739); RT Michigan Franchise, LLC (8760); RT Minneapolis Franchise, LLC (2746); RT Minneapolis Holdings, LLC (7189); RT New England Franchise, LLC (4970); RT New Hampshire Restaurant Holdings, LLC (7438); RT New York Franchise, LLC (1154); RT Omaha Franchise, LLC (7442); RT Omaha Holdings, LLC (8647); RT One Percent Holdings, LLC (6689); RT One Percent Holdings II, LLC (2817); RT Orlando Franchise, LP (5105); RT Restaurant Services, LLC (7283); RT South Florida Franchise, LP (3535); RT Southwest Franchise, LLC (9715); RT St. Louis Franchise, LLC (6010); RT Tampa Franchise, LP (5290); RT Western Missouri Franchise, LLC (6082); RT West Palm Beach Franchise, LP (0359); RTTA, LP (0035); RTT Texas, Inc. (2461); RTTT, LLC (9194); Ruby Tuesday of Allegany County, Inc. (8011); Ruby Tuesday of Bryant, Inc. (6703); Ruby Tuesday of Columbia, Inc. (4091); Ruby Tuesday of Frederick, Inc. (4249); Ruby Tuesday of Linthicum, Inc. (8716); Ruby Tuesday of Marley Station, Inc. (1641); Ruby Tuesday of Pocomoke City, Inc. (0472); Ruby Tuesday of Russellville, Inc. (1601); and Ruby Tuesday of Salisbury, Inc. (5432). The Debtors' mailing address is 333 East Broadway Ave., Maryville, TN 37804.

Protective Life Insurance Company (the “Interpleader Plaintiff”) and Ruby Tuesday Operations LLC (“RTO”), successor in interest to Ruby Tuesday, Inc. (“RTI”) pursuant to the confirmed and effective *Debtors’ Second Amended Chapter 11 Plan, as Modified*, Docket No. 1135 (the “Plan”), Eleanor Taylor, David G. Lynch, John J. Lynch III, Joseph P. Lynch, Catherine Buck and Francis S. Lynch (together, the “Lynch Defendants”) (RTO and the Lynch Defendants, the “Certain Interpleader Defendants” and with the Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree (the “Stipulation”), as follows:

WHEREAS, on or about April 1, 2021, the Protective Life Insurance Company (the “Interpleader Plaintiff”) filed a Complaint [D.I. 1] (the “Complaint”) commencing the above-captioned adversary proceeding against RTI, Eleanor Taylor, David G. Lynch, John J. Lynch III, Joseph P. Lynch, Catherine Buck and Francis S. Lynch (the “Original Defendants”) for a declaratory judgment and related relief.

WHEREAS, on April 20, 2021, the Interpleader Plaintiff filed the *First Amended Complaint-In-Interpleader* [D.I. 3] (the “Amended Complaint”), which revised the Complaint to include RTO as a Defendant (together with the Original Defendants, the “Interpleader Defendants”).

WHEREAS, on or about April 29, 2021, the Interpleader Plaintiff served the Amended Complaint, the Summons and Notice of Pretrial Conference in an Adversary Proceeding on the Certain Interpleader Defendants.

WHEREAS, the Parties have agreed to extend the time within which Certain Interpleader Defendants may answer, move or otherwise respond (the “Response Deadline”) to the Complaint to and including June 28, 2021.

THEREFORE, in consideration of the foregoing, and pursuant to Rule 7012-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, the Parties stipulate and agree that the Response Deadline shall be June 28, 2021 for Certain Interpleader Defendants.

Dated: May 27, 2021

McCARTER & ENGLISH, LLP

/s/ Kate R. Buck

Kate R. Buck (DE Bar No. 5140)
Shannon D. Humiston (DE Bar No. 5740)
405 North King Street, 8th Floor
Wilmington, DE 19801
Tel: (302) 984-6300
Fax: (302) 984-6399
Email: kbuck@mccarter.com
shumiston@mccarter.com

Counsel to Protective Life Insurance Company

ASHBY & GEDDES, P.A.

/s/ Gregory A. Taylor

Gregory A. Taylor (DE Bar No. 4008)
Katharina Earle (DE Bar No. 6348)
500 Delaware Avenue, 8th Floor
Wilmington, Delaware 19899-1150
Tel: (302) 654-1888
Fax: (302) 654-2067
Email: gtaylor@ashbygeddes.com
kearle@ashbygeddes.com

*Counsel to Ruby Tuesday Operations LLC as
successor in interest to Ruby Tuesday, Inc.*

JOHNSTONE ADAMS, LLC

/s/ Jessica L. Welch

Jessica L. Welch
One Saint Louis Centre
1 Saint Louis St. Ste 4000
Mobile, AL 36602
Tel: (251) 441-9273
jlw@johnstoneadams.com

*Counsel to Eleanor Taylor, David G. Lynch,
John J. Lynch III, Joseph P. Lynch,
Catherine Buck and Francis S. Lynch*